

1 They report to him, directly to him.

2 Q. And facility support services doesn't work
3 for Chuck Keaton; is that right?

4 A. No, ma'am. Well, let me stop. There's some
5 departments up there that, they work for him, but they,
6 I mean, if he has a to-do list, he could pass it on to
7 them. So yeah.

8 MS. MAPLES: I'm going to show you another
9 document.

10 (Exhibit 3 was marked.)

11 BY MS. MAPLES:

12 Q. Do you see that this document is also from
13 Jon Walton?

14 A. I see that.

15 Q. Do you see that it's dated February 25th of
16 2021?

17 A. Yes, ma'am.

18 Q. Do you see that the first sentence in this
19 document states: A review of drug testing and substance
20 abuse treatment for July 1st, 2020 to December 31st,
21 2020 identified noncompliance Items 3D, comma, 3G?

22 A. Yes, ma'am.

23 Q. And do you see that Noncompliance Item 1
24 seems to be that inmates given a positive lab test were
25 not then given a disciplinary report?

1 A. I see that.

2 Q. Why is it important for inmates who have
3 positive drug screens to get a disciplinary report?

4 A. To basically hold them accountable.

5 Q. Did CoreCivic struggle with drugs being
6 brought into the facility at Trousdale?

7 A. I don't know, respectfully, what you mean by
8 struggle. We found drugs. We had attempted throw-
9 overs. Staff coming through check point. Coming
10 through the mail. We had our challenges with it, like a
11 lot of prisons I've worked at.

12 Q. That's all I mean when I say struggle, I mean
13 challenges.

14 A. I like the word challenge, but I'll go with
15 struggle.

16 Q. Okay. Do you think that some of the
17 challenges related to the level of drugs or the
18 availability of drugs within Trousdale related to the
19 staffing levels of Trousdale?

20 A. There's only -- well, actually, there's two
21 ways to get into the prison. And those posts are always
22 manned. Always. Check point. And when we have traffic
23 at the sally port. So on that aspect to your question,
24 those posts were manned.

25 Q. Well, when you say get into the prison, I

1 mean, drugs are getting into the prison, right?

2 A. Yes, they are getting into the prison.

3 Q. And those two entries into the prison are not
4 the only ways in which Trousdale employees could monitor
5 or discover drugs inside the prison, right?

6 A. Those two, I'm not sure if I -- and that's my
7 fault. I don't totally understand your question.
8 That's my fault.

9 Q. That's fine. I mean, you're telling me that
10 the two means of entering the prison were always
11 staffed.

12 A. Right.

13 Q. And I guess my question still is, might the
14 availability of drugs within Trousdale be related to
15 understaffing at Trousdale?

16 A. We've intercepted drugs being thrown over the
17 fence. We've intercepted drugs coming through the mail
18 room. Of course, staff coming through. I am not acting
19 like staff didn't get it in there, because I know they
20 did. Someone did. We caught him. Vendors, we have
21 vendors -- we did, for a short period of time before
22 COVID hit, coming in. We always have food coming in.
23 And that stuff is fully searched. It wasn't -- so I
24 mean, there's a lot of ways of trying. And sometimes
25 the bad guys themselves were getting it in. I'm not

1 going to just tie that to being short. Throwing it over
2 has nothing to do with being short. I am not being
3 argumentative. That one, people get very creative how
4 to get that stuff in there.

5 Q. Well, I mean, is a fully staffed prison
6 better able to detect drugs that are already in the
7 prison? I mean, you're talking to me about ways it gets
8 in. I am talking about once it's in.

9 A. No, no, no. In my experience, the answer to
10 that question is no.

11 Q. Well, is one of the ways that you detect
12 drugs once they've entered the prison in doing cell
13 searches?

14 A. It is one of the ways. But I will tell you
15 -- it is one of the ways, yes. But inmates -- all of
16 them are not bad guys. You get your best intel from the
17 inmates. They live there. You get your best -- that's
18 your best resource to get some intel is from the inmate
19 population.

20 Q. Is one way that one might get intel from the
21 inmate population by drug testing them as required?

22 A. That's going to tell you if a guy's got some
23 dope in his system. He has dope in his system. That's
24 all that is going to tell you. Where did you get it
25 from? Must have been something I ate. That's the games

1 they play.

2 Q. So you're saying that drug testing tells you
3 absolutely nothing about the level, availability or
4 source of the drugs in the prison?

5 A. Did I say -- is that on record? Can you
6 repeat that back? Did I ever say that? I don't think I
7 did.

8 Q. Well, I am asking?

9 A. No, I didn't say that.

10 Q. Can you get intel from drug testing prisoners
11 about the source and availability of drugs within
12 Trousdale?

13 A. You'll get that the guy is -- I'll just use
14 high on meth. You'll get that. But again, you ask him,
15 guy, you know, where did you get this from? Oh, it was
16 something you all sold me out of commissary. You will
17 get that the guy is high -- I mean, not necessarily
18 high, but that he has drugs in his system by the drug
19 testing. You get very little intel about where it came
20 from.

21 Q. So you get the intel about where the drugs
22 came from the people you don't drug test?

23 A. Not always. Not always, but a lot of times.
24 Not always.

25 Q. So sometimes you get the intel from the

1 people you actually drug test?

2 A. Occasionally.

3 Q. Okay. Now, if we go down in this document to
4 noncompliant Item 2, it indicates that inmates who test
5 positive on a drug screen are supposed to be retested
6 for a period of three consecutive months. Do you see
7 that?

8 A. I do.

9 Q. Now do you see that CoreCivic didn't do that?

10 MR. WELBORN: Object to the form.

11 THE WITNESS: I see that, yes. I read what
12 he wrote on the paper, yes. I do see that.

13 BY MS. MAPLES:

14 Q. Do you think that CoreCivic's failure to
15 retest inmates as required by policy could be related to
16 the level of staffing going on at Trousdale?

17 A. What I think about this time frame is COVID.
18 COVID. COVID had a direct effect on this, the whole
19 operation of the prison. COVID.

20 Q. Was it related to staff?

21 A. Staff catching COVID? Yes, we had staff
22 catch COVID. Yes. COVID.

23 Q. If you had a greater number of staff members,
24 do you think you would have been better able to retest
25 inmates who tested positive on a drug screen for a

1 period of three consecutive months following the
2 positive test?

3 A. I didn't have the luxury of finding that out,
4 ma'am.

5 Q. Well, what do you think?

6 A. I don't have a thought on it. I do not.

7 MS. MAPLES: Okay, the next exhibit, this is
8 Exhibit 4 to the deposition.

9 (Exhibit 4 was marked.)

10 BY MS. MAPLES:

11 Q. Do you see that this is dated February first
12 of 2021?

13 A. Yes, ma'am.

14 Q. Do you see that it's also from Jon Walton?

15 A. Jon Walton, yes, ma'am.

16 Q. Do you see that it's concerning searches?

17 A. (Reading to self.) Yes, ma'am. I see that.

18 Q. Do you see that under noncompliance issue, it
19 states: On November 9th, 2020, Turner Trousdale was
20 audited and discovered daily cell inspections were not
21 being completed as required by this standard. The
22 contract monitor notified the facility of this
23 requirement and requested that all new unit managers
24 were made aware of the daily cell inspection mandates?

25 A. Yes, ma'am.

1 Q. Do you think that the inability to conduct
2 cell inspections as required was related to the level of
3 staffing at Trousdale?

4 MR. WELBORN: Object to the form.

5 THE WITNESS: This time frame was from
6 October to December?

7 BY MS. MAPLES:

8 Q. Let's see. October 1st, 2020 to December
9 31st of 2020. Do you see that?

10 A. I do, yeah.

11 Q. Okay.

12 A. Staffing very well could have played a role
13 with this one. Caveat, again, with COVID. People out
14 with COVID. And we had them. It was rough. So yeah.

15 Q. Do you see that the second paragraph under
16 noncompliance issues states: An e-mail was sent by the
17 contract monitor to the facility requesting a time to
18 review these inspections and to ensure -- strike that.
19 Do you see the second paragraph under noncompliance
20 issues states: An e-mail was sent by the contract
21 monitor to the facility requesting a time to review
22 these inspections to ensure they occurred daily. As of
23 December 18th, 2020, daily cell inspections were not
24 observed and documentation has been provided to the
25 contract monitors to determine if this requirement is

1 being performed?

2 A. I see that.

3 Q. Do you see that action taken by the TDOC
4 contract monitor indicates that you were notified by
5 e-mail?

6 A. I see that.

7 Q. Do you remember this?

8 A. No, ma'am, I don't. But I do see where he
9 sent it to me, but I don't remember reading this. I
10 don't.

11 Q. Does it concern you that cell inspections
12 were not being performed at Trousdale?

13 MR. WELBORN: Object to the form.

14 THE WITNESS: They should have been
15 performed.

16 BY MS. MAPLES:

17 Q. Does it concern you that they were not being
18 performed?

19 A. To a degree, it does.

20 Q. Are cell inspections one way of monitoring
21 the level of contraband inside the prison?

22 A. It could be, yes.

23 Q. And by contraband, does that include illegal
24 drugs and homemade weapons?

25 A. Those two items are considered contraband.

1 Q. Do the presence of illegal drugs make a
2 facility more dangerous for inmates?

3 A. It could, yes, ma'am.

4 Q. Well, I think it's fair to say that a
5 facility with illegal drugs available versus a facility
6 with no illegal drugs available, your facility with
7 illegal drugs would be more dangerous, right?

8 A. Ma'am, with all due respect, 37 years in this
9 business, I've never worked at a prison that there was
10 not any illegal drugs in it.

11 Q. I understand that, I'm just trying to
12 understand the impact that illegal drugs have on the
13 safety of a prison.

14 A. Just like in the free world, right? It's the
15 same. So I'm not arguing with you. I'm not arguing
16 with you, I'm not. It's the same thing. It has an
17 effect on our society right now. And all of that comes
18 into the prison. Eventually, it makes its way into the
19 prison when the guys get caught. So yeah, I agree with
20 you. Yes.

21 (Exhibit 5 was marked.)

22 BY MS. MAPLES:

23 Q. In this document, do you see there is a
24 document in front of you that is going to be Exhibit 5
25 to your deposition?

1 A. 002376?

2 Q. Yes, thank you.

3 A. Yes, ma'am.

4 Q. Do you see that it's dated February 1st,
5 2021?

6 A. Yes, ma'am, I do.

7 Q. And do you see that the audit scope listed
8 here is July to December of 2020?

9 A. Yes, ma'am.

10 Q. Do you see that this one concerns records and
11 reports?

12 A. Yes, ma'am, I see it.

13 Q. I think we might have touched on this
14 earlier, but can you explain why, in your opinion, it's
15 important to have complete and accurate reports of
16 violent incidents within the prison?

17 A. The purpose of this, this is simply notifying
18 the CCC. Again, I don't know what the CCC stands for.
19 That's what it's about, notifying them within that time
20 frame. I see that. What is the next incident, the
21 death of offender. There's another death. Okay. Are
22 there more on there than those three?

23 Q. Uh-huh.

24 A. Okay, November. (Mumbling.) Was 19 minutes
25 late, okay. The next one says chemical agent on

1 offender, 20 minutes late -- 27 minutes late. This was
2 another use of force. This was -- it doesn't say the
3 time frame on that one. The next one here talks about
4 December -- a weapon -- what is that for, assault.
5 Assault. Offender was without a weapon. Okay.
6 Chemical agents used on the offender. Okay. Are there
7 more?

8 Q. I believe that's all for -- this is all for
9 Contract Monitoring Instrument 1A. So can you explain
10 why it's important for incidents to be reported
11 according to this contract monitoring incident?

12 A. CCC, Central Communication Center, there it
13 is. That's what it stands for. The top two, I think,
14 were deaths. I think they were deaths. Being
15 realistic, when you got a death, that supervisor is
16 running from -- they missed it. They missed the 60
17 minutes. I am not too terribly upset with them for
18 that. They have a lot going on. These chemical agents,
19 they should have been reported on time. There's not
20 that much to that. They should have been reported on
21 time.

22 Q. Do you think the failure to report adequately
23 as described in this report could have been related to
24 the understaffing at Trousdale?

25 A. I don't know that. I'm just reading that the

1 incident happened. I don't know that. I can't marry
2 them two together at this time.

3 Q. Okay.

4 MR. WELBORN: Can we take a break?

5 MS. MAPLES: Sure.

6 (Recess observed.)

7 BY MS. MAPLES:

8 Q. Mr. Byrd, do you recall that before the
9 break, we were discussing this document that is Exhibit
10 5 to your deposition, dated February 1st, 2021?

11 A. Yes, ma'am.

12 Q. Do you remember that it concerns incident
13 reporting?

14 A. Yes, ma'am.

15 Q. And we have just gone through Noncompliance
16 Item 1, so I'm going to control down to Noncompliance
17 Item 2. Do you see that under Noncompliance Item 2, the
18 noncompliance issue is described as Trousdale Turner not
19 being able to produce the required forms concerning
20 seven inmates sent to an off-site hospital, which
21 resulted in death?

22 A. I see it. I see it, yes.

23 Q. Do you see noncompliance Item 3?

24 A. Yes, I see it.

25 Q. And do you see that it states that an

1 incident report is entered within eight hours of the
2 incident?

3 A. Yes.

4 Q. And do you see that the contract monitor
5 identified certain instances in which that didn't
6 happen?

7 A. May I read this, please?

8 Q. Sure.

9 A. Okay, I'm good.

10 Q. Do you see that the contract monitor had
11 certain instances in which CoreCivic employees at
12 Trousdale did not comply with the requirement that
13 incidents be entered into TOMIS within hours?

14 A. I don't see that on the screen. Are you
15 telling me that, or is that on the screen somewhere?

16 Q. Well --

17 A. Okay, yeah.

18 Q. So that's accurate, then?

19 A. This is my first time actually reading this.
20 I'm reading it, I see it. What was the response to
21 this?

22 Q. There you go. Do you see that I've scrolled
23 down and given you --

24 A. I see it, yes. Thank you. Okay, I see it.

25 Q. And do you remember this occurring?

1 A. I do not.

2 Q. Okay. Do you see that you were notified by
3 e-mail?

4 A. I see that.

5 Q. Do you see that, at the bottom of the page,
6 there is a heading, response of contractor and plan of
7 corrective action taken?

8 A. I see that.

9 Q. Do you see in the paragraphs below it, there
10 is a description of the action taken?

11 A. I see it, yes.

12 Q. Is that something you would have been
13 involved in formulating, I guess?

14 A. It would have been one of my AWs. Probably
15 both of them, since one of them was a medical issue and
16 the other one was like an operations issue. The two
17 AWs, along with the (inaudible) department.

18 Q. So along with somebody at headquarters, then?

19 A. Yes, ma'am.

20 Q. Do you see there is another noncompliance
21 Item No. --

22 A. Four? Yes, I see it.

23 Q. Can you describe the noncompliance issue
24 that's been found here?

25 A. I can read to you what he wrote.

1 Q. Well, do you see that at the bottom of the
2 page, he's written that the Trousdale warden slash
3 designee did not send the August, September, October,
4 November and December 2020 monthly reports?

5 A. I see that.

6 Q. Were you responsible for sending these
7 reports, or did you have a designee?

8 A. I had a designee.

9 Q. And when we're referring to the reports, are
10 these reports related to what?

11 A. It says PREA. PREA.

12 Q. Well, let's see, it says here: Determine if
13 TDOC central office directors have reported delays on
14 any instances of required slash requested reports or
15 information that has not been provided in a timely
16 manner as requested. Do you see that?

17 A. I do.

18 Q. So it seems like the PREA inspection reports
19 are the ones that were not sent for a period of five
20 months?

21 A. Yes.

22 Q. Why is it important to submit PREA reports?

23 A. It's in the contract.

24 Q. Does it impact the safety of the prison, do
25 you think?

1 A. Very little.

2 Q. Do you think it impacts TDOC's ability to
3 oversee the prison?

4 A. It could, but you have two contract monitors
5 on site. So they let it go on that long without
6 bringing it to somebody's attention. Five months before
7 they brought it to somebody's attention.

8 Q. Do you see you were advised of this non-
9 compliance via e-mail?

10 A. Yes, ma'am.

11 Q. Under what situations are correctional
12 officers permitted to use force at Trousdale?

13 A. To prevent escape. To defend themselves. To
14 defend inmates. To prevent property damage.

15 Q. Are those the only ones?

16 A. That's the only ones I can think of right
17 now.

18 Q. When I say use of force, can you tell me
19 specifically what that means?

20 A. Use of force. Physical handling. It can be
21 physical handling. Chemical agents. Deadly force.
22 Escapes, of course. Chemical agents. Stop inmates from
23 harming themselves. Use of force for that.

24 Q. By chemical agents, what are you referring
25 to?

1 A. I think we carry something that's called OC
2 spray. The OC has got a big old long name to it. OC,
3 it's spray. Again, physical handling or deadly force.

4 Q. What are the reporting requirements for use
5 of force?

6 A. Contract monitor has to be notified on the
7 state's side.

8 Q. Is there a form or something that has to be
9 filled out?

10 A. There are reports, forms, yes. Report forms
11 you have to fill out.

12 Q. Are you involved in all use of force
13 incidents?

14 A. No.

15 Q. When do you --

16 A. When you say involved, what do you mean by
17 involved? Help me out.

18 Q. I mean, are you notified every time there is
19 a use of force incident?

20 A. I get an e-mail or a phone call.

21 Q. Do you review all of the documentation
22 concerning use of force incidents?

23 A. I'll sign off on it or my two AWs -- three
24 AWs, they can also sign off on it.

25 Q. When you say sign off on it, do you mean --

1 A. Review the documents and sign off on the
2 packet. It's called a packet.

3 Q. What does it mean to sign off on a use-of-
4 force incident?

5 A. You review the documents and sign off on it.

6 Q. Does it mean that you are offering an opinion
7 about the use of force, the reasonableness of it, or
8 does it just mean that you're signing off that you read
9 it?

10 A. It could be, yeah. If the use of force was
11 not authorized, if it was excessive, sign off on the
12 document. Yes.

13 Q. Did you ever determine that there was an
14 excessive use of force while you were warden at
15 Trousdale?

16 A. I don't know if it was excessive, but there
17 was one that -- or maybe two that was unnecessary,
18 maybe.

19 Q. Okay. When you say unnecessary, what do you
20 mean?

21 A. I mean, the officer probably should have done
22 something a little different instead of actually using
23 -- and it probably was going to be spraying the guy.
24 Using their OC. I remember maybe one, maybe, that I
25 signed off on. Generally, your chief of security is

1 going to catch that and what they will do is generate a,
2 what we call a problem solving notice and write it up
3 for disciplinary. Yeah.

4 Q. While you were warden of Trousdale, did you
5 ever give employees directives about when the use of
6 force might be appropriate?

7 A. Yes, I have.

8 Q. Okay. And can you describe your directives,
9 generally?

10 A. If you have to use force, use it. When the
11 resistance stops, you stop.

12 Q. Is that it?

13 A. Pretty much, yes.

14 Q. When you were giving correctional officers
15 directives about using force, did you give any more
16 information about when a correctional officer might need
17 to use force?

18 A. I possibly could have.

19 Q. You just don't remember?

20 A. Yeah, I just don't recall. I don't recall.

21 Q. Were use-of-force incidents things that you
22 might discuss with (inaudible)?

23 A. You broke up on me. I'm sorry, say it one
24 more time, please.

25 Q. Were use of force incidents something you

1 might discuss with Chuck Keaton?

2 A. Yes.

3 Q. How many times did you discuss use of force
4 incidents with Chuck Keaton?

5 A. I can't -- respectfully, I don't know how
6 many times we talked about use of force, I don't know.

7 Q. How might unnecessary or excessive use of
8 force issues be related to understaffing at a facility?

9 A. I don't understand the question, I don't.

10 Q. Well, we talked about how officers who work a
11 great deal of overtime can experience exhaustion or
12 stress, right?

13 A. We talked about that.

14 Q. And I mean, can an officer experiencing a lot
15 of stress and exhaustion perhaps react badly when
16 presented with an inmate who's refusing to comply with a
17 directive?

18 A. What -- I don't know the answer to your
19 question. I don't understand your question. That's my
20 fault. I just don't understand what you're trying to
21 ask. Respectfully, I just don't understand what you're
22 asking.

23 Q. What are some of the reasons that a
24 correctional officer might use unnecessary or excessive
25 force?

1 A. They might lose their composure. I mean,
2 that's what I've seen more than anything, they lose
3 their composure. They let the inmate get the best of
4 them.

5 Q. And do you think correctional officers are
6 more likely to lose their composure if they're suffering
7 from mental or physical exhaustion or extreme stress?

8 MR. WELBORN: Object to the form.

9 THE WITNESS: I've not had one tell me that.

10 BY MS. MAPLES:

11 Q. Could correctional officers use of
12 unnecessary or excessive force be related to a lack of
13 training or the need for additional training?

14 A. Could be.

15 Q. When a prison is understaffed, is it more
16 difficult to do ongoing training?

17 A. Can be.

18 MS. MAPLES: I'm going to show you another
19 document.

20 (Exhibit 6 was marked.)

21 BY MS. MAPLES:

22 Q. Do you see that there is a document on your
23 screen that is going to be Exhibit 6, I think, to your
24 deposition with Bates stamp TDOC 002605 in the top
25 left-hand corner?

1 A. Yes, ma'am.

2 Q. Do you see that it's from Jon Walton and
3 dated February 25th, 2021?

4 A. Yes, ma'am.

5 Q. Do you see that the first sentence states: A
6 review of the use of force standard for July 1st, 2020
7 to December 31st, 2020 identified noncompliance Items
8 2C, 2D, 2E, four?

9 A. I see that.

10 Q. Do you recall receiving a copy of this
11 report?

12 A. No, I do not.

13 Q. Do you recall e-mail correspondence about
14 compliance found concerning use of force standard?

15 A. I don't recall reading this report. In fact,
16 I did not read this report. I can tell you that.

17 Q. Do you see that Noncompliance Item 1 is
18 concerning monitoring instrument use of force Item 2C?

19 A. Your phone broke up on me again.

20 Q. This time I'm on my computer.

21 A. Okay, well, your computer broke up on me.

22 Q. Let's try again.

23 (Whereupon the court reporter informs about
24 some words cutting out, in case that's reason
25 for any confusion. Ms. Maples rejoins via

1 Cell phone.)

2 BY MS. MAPLES:

3 Q. Mr. Byrd, do you see that Noncompliance Item
4 1 is concerning monitoring instrument use of force Item
5 2C?

6 A. Yes, ma'am.

7 Q. And do you see that under noncompliance
8 issue, the contract monitor determined that certain use
9 of force incidents occurred, but the reporting of that
10 incident is not available?

11 A. Yes, ma'am.

12 Q. Do you see that at the bottom of the page, it
13 indicates that you were notified?

14 A. It says I was notified by Chris Brun. It
15 doesn't say how, but yes, I see that. Yes.

16 Q. Do you remember being notified about the
17 video issue?

18 A. No, ma'am, I do not.

19 Q. Do you see that under noncompliance Item 2 --

20 A. Yes.

21 Q. -- there is an issue with use of force
22 reports being provided to the liaison's office within
23 five working days?

24 A. I see it, yes.

25 Q. Do you see that in some cases, use of force

1 reports were submitted late and in one case there was no
2 use of force report available at all?

3 A. I see that.

4 Q. Do you see that you were notified?

5 A. I see where it says I was notified via
6 e-mail, yes.

7 Q. Do you remember being notified about those?

8 A. I do not.

9 Q. Does it concern you that we just looked at
10 two noncompliance issues concerning use of force
11 reporting?

12 A. Does it concern me?

13 Q. Yes.

14 A. It does. It does, yeah. It's concerning.

15 Q. Do you see noncompliance Item 3?

16 A. I do, I see it.

17 Q. Do you see that the requirement is described
18 as: In cases in which prior approval of the use of
19 force by the CD is not possible, notification of the use
20 of force is made within one hour?

21 A. Yes, I see that.

22 Q. Do you see that the contract monitor found
23 the incident involving use of force that the contract
24 monitor was never notified of?

25 A. I'm trying to see where it says they were not

1 notified. Where is that?

2 Q. Right here.

3 A. Okay, I read that. Yes, I see that.

4 Q. And do you see that you were notified by
5 Chris Brun?

6 A. Yes, I see that. Can I read some of this
7 stuff that we're going through, please?

8 Q. Sure. Do you want to be able to scroll
9 through it yourself? Here, I am going to give you
10 control, okay?

11 A. I might do something bad, I'm telling you
12 now. Bad meaning, I might -- I don't know what I'm
13 doing.

14 Q. You're fine. You can just try and scroll
15 through it now.

16 A. I can't get my mouse to...

17 Q. Do you want me to scroll it?

18 A. I think I'm getting over there.

19 Q. There you go.

20 A. Yeah. Okay. Come up just a little bit,
21 please. Did we go up or down?

22 Q. We went up. I was just giving you the first
23 part of that sentence there.

24 A. That's good, right there. Perfect. Perfect,
25 thank you. Okay, I'm good. Thank you.

1 Q. Do you see that Noncompliant No. 4 --

2 A. I see it.

3 Q. -- involves a review of all of the staff
4 involved in use-of-force incidents and whether they
5 received the appropriate level of training?

6 A. I see that, yes.

7 Q. And do you see that it says: Upon review of
8 the facility training record, it has been determined
9 that senior correction officer Justin Dickey's chemical
10 agent certification expired May 6th, 2020 and the staff
11 member certification was not renewed until September
12 12th, 2020. Between this time frame, SCO Dickey was
13 involved in five chemical uses of force events detailed
14 below?

15 A. I see that.

16 Q. Do you see that you were notified?

17 A. I see that.

18 Q. How much time did you spend preparing for
19 today's deposition?

20 A. I don't know.

21 Q. Did you meet with or speak to by phone or
22 Zoom any attorneys to prepare for today's deposition?

23 A. Yes.

24 Q. Did you speak to the attorney who is
25 defending your deposition today, Joe Welborn?

1 A. Yes.

2 Q. And how long did you all talk for?

3 A. Maybe an hour.

4 Q. And when did you all prepare for the
5 deposition?

6 A. During the phone call.

7 Q. I mean what day?

8 A. I don't know.

9 Q. Was it this week?

10 A. We spoke, yes, once this week.

11 Q. And we talked this morning about the fact
12 that you're no longer at Trousdale, but you've not yet
13 been reassigned to another facility; is that correct?

14 A. Correct.

15 Q. And you cited the time frame that you were at
16 Trousdale as warden as April of 2020 until March of
17 2021, right?

18 A. That's what I'm thinking. I think I said my
19 exact date is probably not going to be right.

20 Q. You did, you absolutely did.

21 A. It's going to be some period into that time
22 frame, yes. For exact dates, I don't --

23 Q. During that time period, were you placed on
24 administrative leave at any time?

25 A. You know, I'm on leave. I don't know what

1 kind of -- I'm on paid leave. I'm just waiting to find
2 another facility.

3 Q. Were you present at the facility from January
4 of 2021 through the completion of your tenure as warden
5 of Trousdale in March of 2021?

6 A. Was I at the facility during that time frame,
7 January to March?

8 Q. Physically at the facility?

9 A. Yes.

10 Q. Every day?

11 A. Not every day, no, ma'am. I took a day off
12 every once in a while. No, I wasn't there every day.

13 Q. When did you stop being present physically at
14 the facility?

15 A. I can't -- I don't know. I cannot answer
16 that question because I don't know the exact date. I
17 stated that already, I don't know the exact date.

18 Q. Why were you relieved from your duties
19 as warden at Trousdale?

20 A. There is an incident that took place that the
21 commissioner -- I think it was commissioner or assistant
22 commissioner -- didn't agree with the action that I
23 took. So therefore, I was relieved as a warden at
24 Trousdale and waiting on reassignment somewhere else.

25 Q. When was the incident that you're referring

1 to?

2 A. I don't know the exact date. I do not. I
3 don't even know the month. I'm not sure.

4 Q. Was it in 2021?

5 A. I'm not sure. I'm just not sure of the date.
6 I'm not sure.

7 Q. Well, I mean, you got relieved of your duties
8 around March of 2021. Do you think the incident was in
9 the calendar year of 2021?

10 A. I wish I had that date so I could answer your
11 question as matter of fact. I just don't have the date.
12 I do not and I apologize. Respectfully, I just don't
13 have the date.

14 Q. Can you describe the incident that occurred?

15 A. Sure. There was a staff assault that
16 occurred. Inmate assaulted an officer. We was going to
17 block the inmate up in segregation. He ran -- when the
18 staff got down there, he ran into his cell. They told
19 him to come out. He displayed a -- about a nine-inch
20 homemade weapon sharpened to a point and made a
21 statement multiple times, somebody is going to die
22 tonight.

23 At the time, I was in my office. And I
24 walked down to the pod it happened in. When I got down
25 there, the chief of security advised me of what I just

1 said, the guy showed us a knife and said somebody is
2 going to die tonight. Multiple times. I said okay. I
3 walked out of the building and got my thoughts together.
4 And I came up with a plan, because the inmate was in the
5 cell with a cell-mate. The staff had tried to spray
6 some chemical agents under his door and they was talking
7 to him about giving up the weapon.

8 Not knowing how much time we had before this
9 guy acted out or whatever, or if he carried out his
10 threat that somebody was going to die, I told assistant
11 chief to go around -- go and get me a sledge hammer. We
12 was going to go around to the back of that cell, break
13 the window out and take control of the situation. And
14 that's what happened.

15 Now, how we took control of the situation was
16 we had a shotgun with four bean bags in it. Bean bags
17 is about the size of a 12-gauge bullet, but it's
18 nonlethal. Bean bags, nonlethal. So we went around.
19 We hit the glass, the inmate turns around. We told him
20 to drop the weapon, drop the weapon, show us your hands.
21 He didn't do any of that. So we used some chemical
22 agent on him, that didn't have an effect on him. So I
23 told the sergeant, hit with the bean bags. Sergeant did
24 it four times. The inmate laid on the floor. We saw
25 his hands, he put them behind his back. We got him,

1 took him to segregation.

2 During the debriefing of the situation, I was
3 advised by chief of security that, warden, the guy had
4 threw the weapon out. I don't know if that was after
5 the first one shot, two shots, before we shot. I didn't
6 know. So I didn't know we had the weapon. If I knew we
7 had the weapon, of course, we wouldn't have shot -- we
8 wouldn't have hit him with the bean bags.

9 And the commissioner thought that we didn't
10 handle the situation -- I didn't handle the situation
11 right. Thought we had more time, I guess. But nobody
12 got hurt. Nobody died. And the inmate had no injuries.
13 So that's what happened.

14 Q. You said during the debriefing. Who was
15 present for the debriefing?

16 A. Chief Randy -- Rodney McCloud. Chief.
17 Myself. AW Vinnie Vantell. AW Brandon Wattwood. That
18 may have been -- Assistant Chief Warren may have been in
19 there, too. Assistant Chief Warren.

20 Q. Did you ever discuss this incident with Tony
21 Parker at TDOC?

22 A. I don't know Tony Parker. I never met him.

23 Q. Who communicated to you that TDOC didn't
24 think you handled this situation adequately?

25 A. Charles Keaton. Charles Keaton and Jason

1 Medlin both talked to me.

2 Q. What was their opinion about the situation?

3 A. Their opinion was that it is what it is and
4 the commissioner didn't agree with it.

5 Q. Is it your understanding that you being
6 relieved of your duties was entirely related to this
7 single incident?

8 A. That is my understanding, from what I've been
9 told, yes.

10 Q. So they didn't mention the other homicides
11 that have occurred in the prison while you were warden?

12 A. No, ma'am. Not to me, no, ma'am.

13 Q. You stated that an inmate assaulted an
14 officer and then ran to his cell, right?

15 A. Correct.

16 Q. And I think you said something about that
17 inmate was being taken to segregation; is that right?

18 A. Correct.

19 Q. Why was that inmate being taken to
20 segregation?

21 A. Because of assault on an officer.

22 Q. What was the -- what led to or was going on
23 when this officer was assaulted?

24 A. The inmate had his cell door rigged. When I
25 say rigged, so he could open it when he got it ready.

1 The officers removed like a big chip, potato chip
2 plastic bag out of it and closed it. And his cell mate,
3 who was out at the time, asked the officer to open the
4 door so he could go in the cell. And when he did, the
5 inmate came out and assaulted the officer. So she was
6 just doing her job.

7 Q. How long had the cell door been rigged?

8 A. I don't know.

9 Q. Can you describe the homemade weapon or the
10 homemade knife, I think you described it as?

11 A. Made out of metal. Seemed like maybe a piece
12 that -- I don't know, like a piece that come off the
13 bunk. Nice weapon, sharpened to a real sharp point.

14 Q. About how big was it?

15 A. Nine inches long.

16 Q. Did anybody see where he had been storing it
17 in his cell?

18 A. No, ma'am.

19 Q. Is that something that you think had been
20 missed during one of the daily cell inspections?

21 A. I don't know.

22 MS. MAPLES: Okay, Joe, I think that's all I
23 have.

24 MR. WELBORN: I don't have any questions.

25 MS. HASHEMIAN: I don't have any questions.

1 MS. MAPLES: Mr. Byrd, thank you so much for
2 your time.

3 THE WITNESS: You're welcome. My pleasure.

4 MR. WELBORN: Thanks warden, good to see you.

5 THE WITNESS: Good to see you all as well.
6 Have a great weekend.

7 MS. MAPLES: You, too.

8 FURTHER DEPONENT SAITH NOT.

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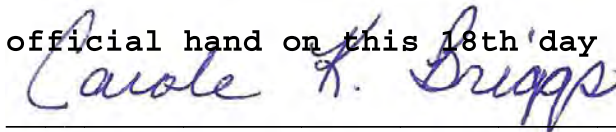
CERTIFICATE

STATE OF TENNESSEE)
) SS.
COUNTY OF DAVIDSON)

I, CAROLE K. BRIGGS, Licensed Court Reporter
within and for the State of Tennessee, do hereby certify
that the above deposition was reported by me and that
the foregoing pages of the transcript is a true and
accurate record to the best of my knowledge, skills, and
ability.

I further certify that I am not a relative,
counsel or attorney of either party nor employed by any
of the parties in this case or otherwise interested in
the event of this action.

IN WITNESS WHEREOF, I have hereunto affixed my
official hand on this 18th day of May 2021.



CAROLE K. BRIGGS
Shorthand Reporter
Tennessee License No. 345

Exhibits	19 83:24	5
Exhibit 2 62:3,4 63:9	1A 84:9	
Exhibit 3 73:10	1B 62:21	5 33:20 82:21,24 85:10
Exhibit 4 79:8,9	1st 62:14,15 73:20 80:8 83:4 85:10 95:6	50 29:16 51:21
Exhibit 5 82:21,24 85:9,10	2	6
Exhibit 6 94:20,23		6 33:24 94:20,23
\$	2 62:3,4 63:9 78:4 85:17 96:19	60 84:16
\$1 19:1	20 84:1	600 69:12
\$3 20:3,9	2020 6:7 33:14 62:14,15,16 64:21 68:13 73:20,21 79:19 80:8,9,23 83:8 88:4 95:6,7 99:10,12 100:16	6th 99:10
0	2021 5:3 6:7 62:11 68:1 73:16 79:12 83:5 85:10 95:3 100:17 101:4,5 102:4,8,9	7
002376 83:1	25 52:16	7 5:3
002502 71:22	2500 53:12,13	733 64:16,22,25 67:17 68:18,25 70:25 71:5
002605 94:24	2500-bed 52:3	8
1	25th 62:10 73:15 95:3	8 35:13 36:5
1 33:10 62:19 73:23 85:16 95:17 96:4	27 84:1	80 45:4,8,9,11,16 46:3,6,21 51:16, 24
10 12:13	2C 95:8,18 96:5	80-hour 49:9
12 50:11,24 51:1	2D 95:8	84 45:21,24 46:20
12-gauge 103:17	2E 95:8	9
12-hour 50:3,5,8,17	3	9:02 5:2,4
12th 99:12	3 63:22 64:8,11 73:10 85:23 97:15	9th 79:19
1300 39:23	30 24:10	A
133 69:11	31 64:15	a.m. 5:2,4
15 12:13 36:15 55:16	31st 62:15,16 73:20 80:9 95:7	Aaron 26:15
15th 68:13	37 82:8	ability 30:18 34:6 41:22 42:6 44:14 89:2
16 50:4,25 51:8	37-year-career 41:12	absolutely 16:24 77:3 100:20
16.50 18:25 19:11,20 20:22 21:2	3D 73:21	abuse 73:20
160 51:13	3G 73:21	acceptable 70:2
164 46:10,23 47:4	4	accepted 8:3,8
16th 68:1,20	4 79:8,9 99:1	access 42:2
17 20:24	40 45:17	
18th 80:23		

accountable 74:4

accuracy 33:4 70:11,12

accurate 30:14,18,21 32:4,21
34:5,20 65:10,11 69:2,9,15 70:13
71:6,9 83:15 86:18

acted 103:9

acting 75:18

action 39:11 66:16,20 68:4 71:16
72:2 81:3 87:7,10 101:22

activities 39:4 41:3,4

actual 27:9

Adams 26:13,15

add 21:10 22:3

adding 22:6 46:25

additional 31:2,4,7,23 32:8 46:7,
20 51:2 67:20 94:13

address 11:21,22,24 12:1 18:6

adequate 41:22

adequately 40:22 41:14 42:4
84:22 104:24

adhere 39:12,15

adhering 39:6

administrative 100:24

admit 29:20

advance 14:13

advertisements 19:2

advertising 21:18 22:1

advice 39:21

advised 89:8 102:25 104:3

affected 23:6 37:8

Afraid 57:7

agenda 14:4 22:15

agent 83:25 99:10 103:22

agents 84:6,18 89:21,22,24
103:6

agree 5:5,8,10,12 34:20 36:7
41:20,25 42:4,5,11,14,17 44:17
49:15 55:22 82:19 101:22 105:4

agreeing 43:11

ahead 10:16 13:6

allowed 46:6,24 54:22

amount 20:10 42:22 48:14 49:8

amounts 21:7

answers 14:14

apologize 102:12

appears 62:6

applicable 63:23

applied 12:16

approach 6:13

approached 6:14,20,24

approval 97:18

approved 21:20

April 6:6,7 22:24 23:13 35:10,22
66:25 100:16

arguing 82:15

argumentative 76:3

arise 12:21

army 50:19,20

arrived 23:13 33:1 34:24 39:19
49:22

arrives 49:23

aspect 74:23

assault 16:19 84:4,5 102:15
105:21

assaulted 54:14 56:19 57:13
102:16 105:13,23 106:5

assigned 5:23 6:1,8 50:15,19,20,
22 61:7

assignments 53:18 60:4,8

assistant 101:21 103:10 104:18,
19

assume 20:22

assumed 20:21

assurance 72:8,9

ate 76:25

attacked 57:13

attempt 18:18

attempted 74:8

attention 31:23 49:13 89:6,7

attentive 48:17

attorney 5:4 99:24

attorneys 99:22

audit 9:1,11,25 10:1,3,5 33:13
62:13,17 83:7

audited 79:20

auditing 63:2,19

audits 8:23 9:4,24 17:19

August 88:3

authored 62:7

authority 21:6

authorized 91:11

availability 74:18 75:14 77:3,11

AW 31:19 104:17

aware 7:4,7 8:21 9:1,4 31:18 35:4
79:24

AWS 87:14,17 90:23,24

B

B-Y-R-D 5:20

back 25:15 55:9 59:1,3,15 66:8
67:3 70:21 77:6 103:12,25

bad 70:15 75:25 76:16 98:11,12

badly 93:15

bag 106:2

bags 103:16,18,23 104:8

ballpark 29:7

based 34:19 35:17 37:21 45:20,
22 46:4 52:23 63:5 66:17

basically 6:25 8:1 9:22 10:8 25:6
74:4

basis 13:3

Bates 71:21 94:24

bean 103:16,18,23 104:8

beds 52:1,12,13,23,24 53:10,12,
17

before-raymond-byrd 37:18

began 5:2 8:12

bell 26:13,20	calculate 48:3	CEO 11:6
big 23:5 58:14 90:2 106:1,14	calendar 102:9	certificates 13:24
bit 6:19 35:12 40:6 58:5 98:20	call 13:17,19 14:13,15 16:9,11, 14,19 17:3,5,20 27:9,24 31:5 49:4 72:10 90:20 92:2 100:6	certification 99:10,11
black 71:24	called 9:23,24 19:14 24:21 28:2 48:8 60:16 90:1 91:2	challenge 74:14
Blake 26:15	calls 13:9,13 14:20,24 15:5 22:13,14,16 24:16	challenges 53:18 74:10,13,17
block 102:17	Campbell 19:3	change 25:17 32:25 38:9,15,17, 18,20,22 39:4,9
blue 71:23	cancel 14:24	changed 39:1,3
bonus 18:22 19:18	canceled 13:9 14:20,21	Charles 104:25
bonuses 18:23 19:14 21:14	cap 53:21	check 24:24 63:23 74:9,22
boss 16:9 22:21 72:12,25	capacity 52:7,9,11,16,22,23 53:11,13	checking 56:1
bottom 87:5 88:1 96:12	care 31:20	chemical 83:25 84:6,18 89:21, 22,24 99:9,13 103:6,21
branch 9:8,22	career 57:11	chief 10:24 91:25 102:25 103:11 104:3,16,18,19
Brandon 104:17	carried 56:5 103:9	Childreth 26:19
Branstetter 5:7	carry 90:1	chip 106:1
break 17:5 40:14 85:4,9 103:12	case 49:12,13,14,25 50:2 55:2 65:12 95:24 97:1	chow 43:21,23
bring 31:22	cases 39:23 57:18 96:25 97:18	Chris 9:9,18,20 10:2,4 35:6 96:14 98:5
bringing 39:22 67:6 89:6	catch 58:25 59:2 78:22 92:1	Christopher 17:8
broad 45:2	catching 78:21	Chuck 10:9 12:14 24:4,17 73:3 93:1,4
broke 92:23 95:19,21	categories 50:7	chucked 57:10
brought 14:1 49:13 74:6 89:7	Cathy 11:4,5	Cimarron 6:10
Brun 17:8 35:6 96:14 98:5	caught 61:25 67:8 75:20 82:19	circular 43:1
Brun's 9:10	caused 25:16,20 54:22	cited 100:15
budget 21:18,19,22,23,25	Caveat 80:13	clarity 30:25 54:1
budgets 21:24	CCC 28:2,3,5 83:18 84:12	clean 47:19
building 11:24,25 60:7 103:3	CD 97:19	close 7:2 31:21 55:9
built 11:23 67:12	cell 41:23 56:5,11,16 57:9,19 76:12 79:20,24 80:2,23 81:11,20 96:1 102:18 103:5,12 105:14,24 106:2,4,7,17,20	closed 106:2
bullet 103:17	cell-mate 103:5	closely 12:15
bunk 106:13	cells 27:1	cohort 39:24
burned 49:16	center 36:22 65:5,16,19 66:1,15 84:12	cohorted 37:10
business 31:20 82:9	central 84:12 88:13	collected 34:4
Byrd 5:14,20 22:22 23:18 33:12 40:21,23 48:10 53:8 85:8 96:3 107:1		combination 72:7
Byrd's 53:14		comma 73:21
<hr/> C <hr/>		comment 65:9
C's 28:3		

commissary 77:16	conducted 9:4	11
commissioner 101:21,22 104:9 105:4	conducting 37:4 38:9	corrective 68:4 71:16 87:7
common 61:19,21	conducts 17:19 55:25	correlating 55:8
communicated 104:23	confusion 95:25	Correspond 10:20
Communication 84:12	connection 53:9	corresponded 24:18
communications 25:23	consecutive 78:6 79:1	correspondence 95:13
company 7:15,20 19:16 20:12, 14,17 21:1	consequences 40:21 41:14 43:16 48:13,15	counsel 39:2
company's 18:21	considered 29:25 45:15 81:25	Counselor 72:25
compiled 8:23	contact 10:10,12 12:5	count 13:24 14:10
complacent 56:22,23,24	context 17:24	counting 68:6
complete 30:13,18,21 32:4,21 34:5,20 83:15	continue 36:24	Counts 13:22
completed 79:21	Continuously 51:10,11	couple 19:4
completely 15:19 39:10	contraband 42:2 81:21,23,25	court 5:3 59:2,14,17 60:1 95:23
completeness 33:5	contract 8:7 9:7,9 27:25 28:7 31:20 32:12 62:7 63:6,16 66:6,7,9 68:13 71:9 79:22 80:17,20,25 81:4 84:9,11 86:4,10 88:23 89:4 90:6 96:8 97:22,23	cover 49:6
completing 37:23	contractor 68:4 71:16 72:1 87:6	covered 64:14 65:6
completion 101:4	control 21:19 40:5 85:16 98:10 103:13,15	COVID 22:25 23:3,8 30:11 37:8, 13 38:4 40:2,4,7,9,10,11,12 52:9, 10 67:6,9 72:17 75:22 78:17,18, 19,21,22 80:13,14
compliance 62:8 72:10,20 89:9 95:14	conversation 7:23	create 42:25
comply 86:12 93:16	copy 95:10	creative 55:2 76:3
complying 31:12	Corecivic 5:10,22 6:11,13,14,20 7:4,13,15,19 8:12 10:9,19 11:12 12:5 17:16 18:5,18 20:20 21:7,16 27:16 28:12 30:21 31:8,11 32:4 34:4 36:10 37:5 39:2,5,11,14 44:23 46:5,9 47:5,8,24 48:1 49:9 51:15 65:17,23 66:18 68:17 69:4 71:18 72:5,21 74:5 78:9 86:11	critical 63:25 64:12,13,16,22,25 66:20 67:17 69:17 70:1,25
composure 94:1,3,6	Corecivic's 30:13 45:3 78:14	crossed 20:7
compromise 55:3	corner 94:25	cry 41:9
comptroller 8:22 9:2,5,12 17:7, 13,15,25 33:17	corporate 11:17 21:20	cuffs 57:1
comptroller's 10:3	correct 18:3 28:9 31:10,25 39:13 60:14 64:5 100:13,14 105:15,18	Cushing 6:11
computer 95:20,21	corrected 68:12	cuss 57:9
concern 35:18 65:1 67:22 81:11, 17 97:9,12	correction 55:12,15,16,18 57:20 61:7 72:1 99:9	custody 56:20 57:6,14,15
concerned 60:19 67:17	correctional 6:2,10 10:25 23:19 35:14 36:22 50:12,13,16,18 55:13 60:12 89:11 92:14,16 93:24 94:5,	customer 25:7 30:23 31:15 32:7 35:9
concerns 7:14,20 37:1 83:10 85:12		cutting 95:24
conclusion 33:21		
conclusions 10:5 17:9,13		
condition 7:9		
conditions 6:16,19 7:7		
conduct 36:23 41:22 44:14 80:1		
		D
		daily 63:24 79:20,24 80:22,23 106:20
		damage 89:14
		Damon 11:8,9,11
		dangerous 82:2,7

data 34:6	DEPONENT 107:8	discussing 85:9
date 68:19 100:19 101:16,17 102:2,5,10,11,13	deposed 5:15	discussion 59:4
dated 33:13 34:15 62:10 73:15 79:11 83:4 85:10 95:3	deposition 5:1,6 62:3 79:8 82:25 85:10 94:24 99:19,22,25 100:5	discussions 25:2
dates 6:3,6 68:11 100:22	describe 26:24 87:23 92:8 102:14 106:9	displayed 102:19
day 48:11,12 100:7 101:10,11,12	description 87:10	division 13:9,13,19 15:5 22:14 24:16
day-to-day 6:22	descriptor 61:18	doctors 39:21
days 12:8 64:15 96:23	Deshawn 26:19	document 9:19 13:25 14:4,11 15:9 33:9,21 62:6 63:8 64:24 73:9,12,19 78:3 82:23,24 85:9 91:12 94:19,22
deadly 89:21 90:3	Design 59:24	documentation 80:24 90:21
deal 53:22 69:21 93:11	designed 36:11 58:17	documents 54:19 91:1,5
dealing 7:25 40:7 72:17	designee 88:3,7,8	dollar 19:11,24 21:4
dealt 38:4 53:20,21	detailed 99:13	dollars 20:7
death 17:1,2 83:21 84:15 85:21	details 17:21	dominated 40:4,10
deaths 33:24 84:14	detect 76:6,11	dont 52:5
debriefing 104:2,14,15	determine 49:5 52:22,23 54:22 80:25 88:12 91:13	door 55:8,9,11,12,14,19 56:15 103:6 105:24 106:4,7
December 62:14,15,16,17 63:18 64:15,20,21 73:20 80:6,8,23 83:8 84:4 88:4 95:7	determined 19:21 20:17 96:8 99:8	doors 55:1,5 56:1 58:16,19
decide 20:14	Dickey 99:12	dope 76:23
decided 20:19	Dickey's 99:9	dormitory 60:7
decision 19:25	die 102:21 103:2,10	drafted 71:17 72:5,6
decrease 42:21	died 104:12	drop 103:20
deem 27:7	difficult 15:23 94:16	drug 36:24 37:1,5,24 38:10,23 39:17 73:19 74:3 76:21 77:2,10, 18,22 78:1,5,25
defend 89:13,14	difficulties 31:11 53:6	drugs 16:15 42:2 74:5,8,17,18 75:1,5,14,16,17 76:6,12 77:4,11, 18,21 81:24 82:1,5,6,7,10,12
defending 99:25	direct 12:18 60:16,17,20 61:3 78:18	due 41:10 44:21,23 58:20 59:10 82:8
define 52:21	directive 93:17	duly 5:15
degree 81:19	directives 92:5,8,15	duties 66:10 101:18 102:7 105:6
delay 59:9	directly 73:1	
delayed 58:5,20	director 7:24 12:7,15	E
delays 88:13	directors 88:13	
demote 11:2	disciplinary 73:25 74:3 92:3	e-mail 10:20 24:19 80:16,20 81:5 87:3 89:9 90:20 95:13 97:6
department 35:15 47:23,24 87:17	discover 75:5	e-mails 15:11,12
departments 73:5	discovered 79:20	earlier 35:8,21 83:14
depended 49:1	discrepancies 68:6,18	
depending 14:23 44:19 46:19	discuss 17:15,23 28:12 66:11 92:22 93:1,3 104:20	
depends 49:1,7	discussed 8:11 13:18 17:7	

effect 43:1 59:9 78:18 82:17
103:22
effective 56:11
employed 5:21 20:16
employee 16:18 18:22 45:4,20
49:8,21,22 50:3,22,24 51:3,8,12
employee's 48:19
employees 20:15 22:3 39:5,11,
15 42:15,18,22 44:24 45:1,14,17
46:10 47:7 48:14 49:15,16 50:7
57:5 75:4 86:11 92:5
employment 6:3 9:3
enable 39:11
enhanced 18:12
ensure 34:3 36:10 80:18,22
ensuring 30:12 32:20
entered 76:12 86:1,13
entering 75:10
entire 28:15,21,22 51:23
entries 75:3
equal 52:11
Erin 5:9
escape 54:9,11 89:13
Escapes 89:22
essentially 11:4
events 13:25 19:1 23:14 99:13
Eventually 82:18
everyday 28:25
exact 6:3,5 11:21,22,23 12:1
14:22,24 15:15 28:24 29:3,6 52:2,
4 53:16 100:19,22 101:16,17
102:2
EXAMINATION 5:17
examined 5:15
examples 13:21 41:13,16,19
43:17 44:2
excessive 91:11,14,16 93:7,24
94:12
excuse 6:6 44:4
executives 10:10,19 12:6 20:19

exhausted 55:16
exhaustion 93:11,15 94:7
exhibit 33:10 62:3,4 63:9 73:10
79:7,8,9 82:21,24 85:9 94:20,23
expect 48:9,11
expected 55:13
expenses 19:17
experience 31:11 76:9 93:11
experiencing 93:14
expired 99:10
explain 83:14 84:9
extreme 94:7

F

face-to-face 9:9
facilities 8:25 13:10 36:10
facility 5:23,25 6:2,4,10,17,23
7:5,16,18,21 8:9 13:24 14:10
20:16 21:18,22 24:8,18 25:1 34:4
52:3 53:10,12,13,17 65:5,16,19
66:1,15,21,25 72:23 73:2 74:6
79:22 80:17,21 82:2,5,6 93:8 99:8
100:13 101:2,3,6,8,14
fact 19:3 39:23 95:15 100:11
102:11
factly 61:24
factors 43:7
facts 65:12 69:21
factual 65:2 69:22,24
failed 32:4
failure 78:14 84:22
fair 15:1 23:8 82:4
fairs 19:16 21:15
fall 41:3 50:9
familiar 62:23
family 7:2 67:7
fatigue 48:16
fault 75:7,8 93:20
February 62:10 66:10 73:15
79:11 83:4 85:10 95:3

feces 57:10
fed 43:21,23
feedback 25:4,6
felt 15:20
fence 75:17
fights 30:9
figure 12:2 25:22 30:10 32:2,16
43:15 53:11 59:11 68:16
fill 14:13 22:8 28:6 49:23 66:20
90:11
filled 64:17,22 65:1 68:11 71:1
90:9
find 67:13 101:1
finding 36:15 79:3
findings 10:5 17:9,13
finds 50:1
fine 41:20 75:9 98:14
five-day-a-week 50:21
floor 103:24
Flyers 19:5
focus 40:3,6
folks 19:16,18
follow-up 31:4,6
food 75:22
fooled 47:3
force 84:2 89:12,18,20,21,23
90:3,5,12,19,22 91:4,7,10,14
92:6,10,15,17,25 93:3,6,8,25
94:12 95:6,14,18 96:4,9,21,25
97:2,10,19,20,23 99:13
foregoing 5:1
forgot 9:23
form 13:5 22:7 23:10 28:10
34:22,23 35:19 37:16,17,25 38:16
43:19 44:6 46:12 54:24 55:21
59:13 69:7 70:3,4,17,19 71:3,4,
11,12 78:10 80:4 81:13 90:8 94:8
formal 12:19,21
format 14:6,11,12
forms 85:19 90:10

formulating 87:13

Fort 19:3

forward 35:10 72:12

found 55:3 74:8 87:24 95:14
97:22

frame 78:17 80:5 83:20 84:3
99:12 100:15,22 101:6

free 82:14

frequently 16:2 29:24 47:16

friends 24:14,15

front 82:24

frozen 49:23

FSC 65:5,13,14,15

fully 23:18,20 24:11 41:12 75:23
76:5

G

game 61:25

games 76:25

gas 19:6

gates 58:15,18,19

gave 9:18,20 15:10 25:25 26:3

GEDS 13:23

general 15:20 39:1 54:5,8 57:16
58:13 60:6

generally 17:3 25:23 39:1 42:12
43:4 91:25 92:9

generate 92:1

Georgia 7:1 13:16

give 7:22 12:23 13:21 15:15,24
16:11 17:8,12 19:17 28:23 36:18
41:16,18 44:2 49:3 61:14,16,17
63:14 92:5,15 98:9

giving 17:10 47:18 92:14 98:22
103:7

glass 103:19

good 5:18 19:8,9,17 24:14,15
36:19 46:21 47:1,3 86:9 98:24,25
107:4,5

Graduation 13:22

graduations 13:23 14:9

great 40:17 93:11 107:6

greater 42:1 78:23

grip 57:20,21

group 19:14,16

guaranteed 70:13

guess 21:4,19 22:16 32:2 75:13
87:13 104:11

guy 77:13,15,17 91:23 103:1,9
104:3

guy's 76:22

guys 75:25 76:16 82:19

H

hammer 103:11

handcuffs 56:25 57:5

handle 66:19 104:10

handled 21:16 104:24

handling 89:20,21 90:3

hands 103:20,25

happen 40:5 41:10 47:13 48:18
49:24 54:23 58:7 61:19,20 86:6

happened 15:20 16:4 22:19
25:16,21 26:6 27:11 30:11 47:13,
16,17,19 61:9,18 85:1 102:24
103:14 104:13

happening 66:24

happy 68:23

hard 23:1 48:3

harming 89:23

Harold 11:3

Hashemian 5:11 34:23 37:17
53:5 70:4,19 71:4,12 106:25

hat 50:1

head 30:2

header 72:1

heading 33:21,24 36:4 87:6

headquarters 11:13 21:16 71:18
72:6 87:18

hear 40:23,24 53:4,5

heard 9:6,7 56:7 62:25

hey 8:19 32:11 52:17

high 28:25 77:14,17,18

higher 30:5 43:1

highest 70:25 71:8

Hininger 11:9

hired 19:15

hiring 13:25 19:1 23:20,21,22

hit 22:25 23:1,8 37:8 39:19,23
75:22 103:19,23 104:8

hold 74:4

holler 57:9

home 67:7

homemade 42:2 81:24 102:20
106:9,10

homicide 16:23 25:14 26:1

homicides 25:1,10,24 26:8
105:10

honest 20:8 40:1

hope 27:20

hospital 67:12,14 85:20

hour 19:20 20:3,7,10 97:20 100:3

hourly 20:14

hours 45:4,8,9,11,14,17,21,24
46:3,7,10,18,19,20,21,23 47:4
50:4,11,24,25 51:1,2,4,8,13,16,21
55:16 86:1,13

housing 53:18

HR 11:4 48:5

huh-uh 16:17

human 47:23,24

hundred 32:23

hungry 43:22,23

hurt 104:12

husband 67:8

hypothetical 69:19

I	injuries 104:12	J
identified 73:21 86:5 95:7	inmate 16:18,23 33:24 36:5,24 37:1,5,24 38:10 39:17 44:3,14,17 53:24 54:1,2,4,13,15 57:6,7,8,21 76:18,21 93:16 94:3 102:16,17 103:4,19,24 104:12 105:13,17,19, 24 106:5	Janna 5:7 53:5
illegal 81:23 82:1,5,6,7,10,12	inmates 7:25 8:5 26:11 36:12 37:9 42:1,12 53:13,17 54:5,7,13 55:2 56:19,24 57:13,18 60:22 67:14 73:24 74:2 76:15,17 78:4, 15,25 82:2 85:20 89:14,22	January 33:13 34:17 101:3,7
impact 39:5 42:6 44:14 48:19 56:4 82:12 88:24	inside 44:18 60:21 75:5 81:21	Jason 11:1 12:11 104:25
impacted 23:3	inspection 56:5,16 79:24 88:18	JDE 68:12
impacts 89:2	inspections 56:1,2,11 79:20 80:2,18,22,23 81:11,20 106:20	Jennings 5:8
important 44:18 57:24 60:15,18 61:1,2 74:2 83:15 84:10 88:22	instances 86:5,11 88:14	job 6:24 7:3,24 8:3,8,11,12 19:16 21:14 35:7 42:23 106:6
inability 80:1	institution 27:8,9 28:4,15,21,22 29:2,13,21 30:3,6	Joe 5:9 59:21 99:25 106:22
inaccurate 69:5	institutional 29:24	John 65:7
inadequately 41:25 42:6	instrument 62:20 63:2 84:9 95:18 96:4	Jon 62:7 73:13 79:14,15 95:2
inaudible 87:17 92:22	instruments 62:24 63:5,23	July 73:20 83:8 95:6
inches 106:15	intel 76:16,18,20 77:10,19,21,25	Justin 33:18 99:9
incident 8:19 16:8 24:23 25:16, 19 26:5 27:4,7,22,23 42:19 48:20 58:6 59:10 83:20 84:11 85:1,12 86:1,2 90:19 91:4 96:10 97:23 101:20,25 102:8,14 104:20 105:7	interacted 12:12	K Keaton 7:23 8:11 10:9 12:7,14 13:10,15,20 14:5,23 15:4,8,12,14 16:6,8,14 17:16,18 21:11 22:8,12 24:4,17 25:2,5,24 72:25 73:3 93:1,4 104:25
incident-related 27:13	intercepted 75:16,17	key 33:21 66:24 67:2
incidents 8:15 13:22 14:10 16:7 24:20,21 30:8 33:25 35:8 57:25 58:9 83:16 84:10 86:13 90:13,22 92:21,25 93:4 96:9 99:4	intervene 42:18	kicking 57:22
include 81:23	introduce 5:5	kids 67:8
included 72:23	involved 72:8,14 87:13 90:12,16, 17 99:4,13	kin 25:8
including 15:4	involves 99:3	kind 12:19 13:18 14:4,9 15:7,22 18:5 19:1,7 25:2,4 26:3 42:25 43:17 47:11 49:22 59:10 61:17 101:1
incorrect 68:11	involving 97:23	kinds 25:23 41:18
increase 18:19	issue 8:9 10:1 32:15,17 33:5 34:20 55:7 59:18,20 64:11 79:18 85:18 87:15,16,23 96:8,17,21	knew 40:9 65:2 104:6
increased 67:1	issues 7:14,20 17:23 18:7 40:9 53:24 58:20,24 59:10 66:11 67:11 80:16,20 93:8 97:10	knife 103:1 106:10
increasing 21:8	item 21:25 62:21 64:8,11 73:23 78:4 85:16,17,23 87:21 95:17,18 96:3,4,19 97:15	knowing 58:22 103:8
individually 24:25	items 22:15 62:15 63:20 71:15 73:21 81:25 95:7	knowledge 30:19
individuals 20:16 44:20 50:20		L
influence 43:7		lab 73:24
information 16:6 31:3,7,24 32:8 34:5 48:9 67:19,20 68:25 88:15 92:16		lack 94:12
informed 23:25		laid 103:24
informs 95:23		

late 83:25 84:1 97:1		meaning 98:12
laughing 24:13	M	means 7:10,11 45:17 46:9 75:10 89:19
lead 42:21 43:24 49:16	made 21:2 31:17 55:1 67:11 79:24 97:20 102:20 106:11	meant 60:12
leads 43:1 49:19	mail 74:10 75:17	measures 25:12
leave 58:18,19 100:24,25 101:1	maintain 66:1	medical 39:21 87:15
led 26:1 57:12 105:22	make 7:4,7 24:11 25:7 32:17 41:8,10 42:7 44:21,23 55:13,18 57:1 65:9 82:1	Medlin 11:1 12:9,12 105:1
left 64:17,22 65:1 70:1 71:1	makes 32:18 39:9 49:5 82:18	meet 99:21
left-hand 94:25	making 40:11 50:23 56:20 60:24, 25	meeting 66:8
legal 39:2	man 24:22	meetings 10:19 66:10
legitimate 66:22	management 34:3,9 35:23,24, 25 36:8,9	member 99:11
level 8:13 66:21 67:21 74:17 77:3 78:16 80:2 81:21 99:5	manager 12:7	members 67:7 78:23
levels 18:19 21:8 23:4,7 74:19	managers 79:23	memos 15:7,10
liaison's 96:22	managing 7:24 12:15	mental 94:7
light 40:11	mandates 79:24	mention 8:13,15 17:18 105:10
limit 49:10	mandatory 36:11 48:22,25	mentioned 9:8,23 18:9 26:4 43:12 44:7,21 56:18
list 41:4 73:6	manned 74:22,24	met 66:13 104:22
listed 62:14 83:7	manner 88:16	metal 106:11
live 76:17	Maples 5:7,17 13:12 23:23 28:11 33:8,11 35:2 36:1 37:20 38:7,19 40:13,17,20 44:1,9 46:15 53:7 55:4,24 59:2,5,7,21,25 60:2,3 62:2,5 69:10 70:9,24 71:7,14 73:8,11 78:13 79:7,10 80:7 81:16 82:22 85:5,7 94:10,18,21 95:25 96:2 106:22 107:1,7	meth 77:14
lived 24:9,10	March 6:6,7 68:1,20 100:16 101:5,7 102:8	miles 24:10
lock 27:8 28:18 29:2,13,21 30:2, 10	mark 49:9	mind 13:25 14:4 20:7 39:25 40:12 56:8
lockdown 26:24 27:2,3,9,10,13, 14,15,17 28:4,14	marked 33:10 62:4 73:10 79:9 82:21 94:20	minimally 36:23 37:4,23 38:10 39:16
lockdowns 27:19 28:12,20 29:23,24 30:7	marry 85:1	minute 7:22
locks 55:3	master 49:4	minutes 83:24 84:1,17
long 48:16 89:5 90:2 100:2 106:7, 15	mate 106:2	missed 84:16 106:20
longer 100:12	math 46:17 47:1	misspeak 53:2
looked 7:18 8:2,3 63:1 97:9	matter 19:3 61:24 102:11	misstating 27:20
lose 94:1,2,6	Mccloud 104:16	mistake 55:19
lost 40:11 53:9		mistakes 55:1 56:20,23
lot 19:7,18 25:10 39:20,21 40:8 41:3 49:16 67:10 72:18 74:11 75:24 77:23 84:18 93:14		misunderstood 52:18
low 28:24		monitor 27:25 28:7 55:17 62:7 66:6 68:13 71:9 75:4 79:22 80:17, 21 81:4 86:4,10 90:6 96:8 97:22, 24
luxury 79:3		monitoring 62:20,23 63:5,23 64:14 81:20 84:9,11 95:18 96:4

monitors 9:7 31:21 32:12 63:6
66:8,9 80:25 89:4

month 15:22 48:10 64:14,15,21
102:3

monthly 13:3 62:14 63:15,17,18,
19 88:4

months 18:25 19:1,13,25 20:23
21:3 40:7 63:25 78:6 79:1 88:20
89:6

morning 5:18 100:11

mouse 98:16

moved 57:19

Moving 19:17

multiple 15:21 64:13 102:21
103:2

Mumbling 83:24

N

names 26:11

narrow 41:15,17

Nashville 65:5 66:13,14,18

necessarily 77:17

needed 31:2

Negatives 37:10

Nice 106:13

nighttime 26:25

Nikki 5:11

nine-inch 102:19

non- 89:8

non-overtime 45:18,24

noncompliance 62:19 63:4,10,
12,22 64:8,11 66:4 67:10 73:21,
23 79:18 80:16,19 85:15,16,17,
18,23 87:20,23 95:7,17 96:3,7,19
97:10,15

noncompliant 78:4 99:1

nonlethal 103:18

notice 56:15 92:2

notification 97:19

notified 17:6 25:7 35:9 64:20
79:22 81:4 87:2 90:6,18 96:13,14,

16 97:4,5,7,24 98:1,4 99:16

notifying 83:17,19

November 79:19 83:24 88:4

number 14:23,25 15:16 28:24
29:3,14,17 30:5 36:23 37:4,24
38:10 39:16 41:21,22 42:7 43:17
49:3 52:2,5,12,13,22,23,24 53:10,
16 58:15 61:14 63:14 64:25 65:2
67:18 68:18,25 69:2,9,12,16 70:1,
13,25 71:8 78:23

numbers 29:5 32:10 52:19 61:16
65:13 68:11 69:15 70:11,12

O

Object 13:5 23:10 28:10 34:22,23
35:19 37:16,17,25 38:16 43:19
44:6 46:12 54:24 55:21 59:13
69:7 70:3,4,17,19 71:3,4,11,12
78:10 80:4 81:13 94:8

observed 40:19 80:24 85:6

OC 90:1,2 91:24

Occasionally 15:15 78:2

occur 29:23

occurred 24:20 58:9 80:22 96:9
102:14,16 105:11

occurring 57:25 86:25

October 62:15,17 68:13 80:6,8
88:3

off-site 67:12 85:20

off-the-record 53:6 59:4

offender 83:21 84:1,5,6

offering 91:6

office 11:17 21:21 72:9 88:13
96:22 102:23

officer 10:25 23:19 55:12,13,15,
17,18 57:20 60:9,12,22,23 61:7
91:21 92:16 93:14,24 99:9 102:16
105:14,21,23 106:3,5

officers 50:12,13,16,18 60:21
67:13,15 89:12 92:14 93:10 94:5,
11 106:1

Oklahoma 6:11 27:21

one-month 69:17 70:2 71:2

ongoing 42:22 94:16

open 55:8,11 58:19 105:25 106:3

opened 55:12

opens 55:12

operating 25:18

operation 37:9 78:19

operations 23:6 87:16

opinion 17:8,11,12 19:19 32:3
34:25 58:5 69:18,25 83:14 91:6
105:2,3

opportunity 47:18 66:5 69:4

order 38:25

ordinary 7:8

out-of-the-norm 27:23

overdose 16:11,13

overdoses 26:21

overs 74:9

oversee 89:3

oversight 42:12

overtime 44:24 45:1,9,12,15,22
46:3,7,19,25 48:14,22,25 49:9,16
51:17 93:11

P

packet 91:2

paid 20:22 101:1

pandemic 39:19,23

paper 78:12

paragraph 36:21 68:3 71:25
80:15,19

paragraphs 87:9

Parker 104:21,22

part 23:5 34:11 37:1 56:1 98:23

partial 29:23,25 30:7

pass 73:6

Patrick 10:24 12:9

pattern 21:10 22:3

pay 18:25 19:10,17 20:14 45:5,6,
9

paying 20:6	point 51:20 74:9,22 102:20 106:13	prison's 44:14
PDF 33:20,23 35:13 36:5	pointed 32:15	prisoners 77:10
people 11:4 18:23 19:8 39:24 43:21 48:5 76:3 77:22 78:1 80:13	policies 32:25 38:9 39:15	prisons 9:25 57:3 58:17 74:11
percent 32:23	policy 38:17,18,20,21,22,24,25 39:3,6,9,12 45:3 46:6,10 47:5,8 51:15,19 78:15	problem 8:4 23:7 24:1 31:4,5,17, 22 37:5,15,23 38:14 41:2 92:2
Perfect 98:24	Polly 5:9	problematic 34:6
performance 33:13	population 54:6,8 60:6 76:19,21	problems 7:4,6
performed 8:24 36:10 81:1,12, 15,18	port 74:23	procedure 25:19,20
period 45:5,6,9,12,15,20 46:2,11, 24 47:4 51:16,21 62:13,17 63:19 64:14 69:17 70:2 71:2 75:21 78:6 79:1 88:19 100:21,23	position 6:13 21:10 22:6	procedures 36:11
permissible 36:16	positions 50:14 68:9,10	produce 85:19
permitted 46:10 89:12	positive 37:9,10 73:24 74:3 78:5, 25 79:2	programming 44:15,17
person 18:22 48:4	possibly 92:18	promote 11:2
phone 10:21 24:19 90:20 95:19 96:1 99:21 100:6	post 49:23 66:20 67:12,14,17	properly 55:1,19 57:1
physical 58:20 59:23,24,25 89:20,21 90:3 94:7	posts 63:25 64:12,13,16,22,25 65:6 69:17 70:1,25 74:21,24	property 89:14
physically 24:7 101:8,13	potato 106:1	protect 36:11
piece 37:8 106:11,12	potentially 6:21	protection 54:10,11,14,15
pipeline 19:8,9	powerless 39:10	protective 56:20 57:6,13,15
place 8:2 18:8,10,15 19:21,23 20:1,12,19 21:1,4 32:25 40:8 49:23 58:14,17 101:20	pre-covid 24:1	provide 14:14 31:3,7 34:6
places 58:16 60:19	PREA 88:11,18,22	provided 67:24 80:24 88:15 96:22
plaintiff 5:8	prepare 99:22 100:4	public 33:24
plan 18:6 67:13 68:4 71:16 72:1 87:6 103:4	preparing 99:18	pull 48:2
planning 58:24 59:10,17	presence 82:1	pulled 68:11
plant 58:20 59:19,22,23,24,25	present 53:18 101:3,13 104:15	pulls 49:25 57:21
plastic 106:2	presented 93:16	pumps 19:6
play 77:1	pretty 19:8,9 47:3 92:13	purpose 83:17
played 80:12	prevent 89:13,14	put 18:5 19:6 20:19 21:1,4 52:4 56:24 57:1,5 66:24 103:25
pleasure 107:3	previous 63:24	
plethora 43:24	prior 97:18	Q
pod 27:10 28:21 29:25 30:2,10 60:5,9,12,22 61:6 102:24	priority 24:3 32:21	quality 72:8,9
pods 27:10 30:1 55:17 60:8	prison 7:8 8:13,16,24 22:20,22 23:6,16,19 24:2 28:18 39:20 40:22 41:11,14 42:1,6,9,11,14,17 43:4,16 44:18 56:10 66:17,25 70:15 74:21,25 75:1,2,3,5,10 76:5,7,12 77:4 78:19 81:21 82:9, 13,18,19 83:16 88:24 89:3 94:15 105:11	quarterly 62:15,17 63:18,20
		question 30:24 32:7 37:19 45:2 46:13 49:3 60:23 69:23 70:6,7 71:19 72:4 74:23 75:7,13 76:10 93:9,19 101:16 102:11
		questions 29:5 31:4,6 106:24,25
		quick 40:13
		quicker 30:2 41:18

R		
rabbit 49:25	recollection 26:16 32:3	repeat 56:8 71:19 77:6
Rack 27:2	record 5:19 40:18 77:5 99:8	replacement 49:22
Radio 19:2	records 66:2 83:10	report 12:17,18 13:1,3 17:7,13, 22,25 27:16,19,23 28:1,5,6 31:22 32:6,8,12,16,17 33:13 34:15 35:1, 7,17 47:11,20 51:6 62:14 63:4,10 66:4 67:19,25 68:24 73:1,25 74:3 84:22,23 86:1 90:10 95:11,15,16 97:2
raise 20:2 21:4	recruit 19:4,16	reported 34:4 71:9 84:10,19,20 88:13
raised 20:24	recruiting 21:18 22:1 23:14	reporter 5:3 59:2,14,17 60:1 95:23
ran 102:17,18 105:14	rectify 31:23	reporting 30:13,23 31:8,12 33:1, 4,5,24 34:20 85:13 90:4 96:9 97:11
random 36:23 37:1,5,24 38:10 39:16	red 34:3	reports 8:23 9:11 12:19 13:2 17:9,15,19 30:17,22 31:25 32:4, 20 63:13 65:4 66:17 70:14 83:11, 15 88:4,7,9,10,14,18,22 90:10 96:22 97:1
Randy 104:16	reducing 44:18	represent 5:5,10,11
rapid 57:24	refer 18:22	request 21:11 31:24 32:9
rare 61:19,22	referrals 18:21 21:14	requested 15:9 22:2 79:23 88:14,16
Raymond 5:14,20 22:22 23:18 24:24 25:6,9 53:14	referred 64:3	requesting 80:17,21
reached 49:9	referring 10:14 18:23 27:5 31:15 36:8 62:20 64:6 88:9 89:24 101:25	requests 32:10
react 93:15	reflected 64:16	required 13:2 36:23 37:4,23 38:10 39:16 42:7 49:8 50:10,11 64:1,13 76:21 78:15 79:21 80:2 85:19 88:14
read 9:19 34:7,14 36:13,21 37:22 59:1,3,15 78:11 86:7 87:25 91:8 95:16 98:3,6	refresh 26:15	requirement 63:22 79:23 80:25 86:12 97:17
reading 35:24 68:8 79:17 81:9 84:25 86:19,20 95:15	refusing 93:16	requirements 31:9,12 90:4
ready 14:14 105:25	regard 10:22 18:12 38:9 60:4	resistance 92:11
real 31:21 106:13	regular 13:3 45:18 61:18	resource 76:18
realistic 84:15	regularly 27:4,13 28:19 61:19	resources 47:23,24
reason 9:17 66:22 95:24	rejoins 95:25	respect 82:8
reasonable 48:12 69:16	related 16:7 27:4 30:7 43:13 44:2 55:6 74:17,18 75:14 78:15,20 80:2 84:23 88:10 93:8 94:12 105:6	respectfully 7:9,10 10:13 15:24, 25 28:17 29:11,14,17,19 30:25 31:14 32:6,9 35:1,6,11 37:19 38:2,3 39:18 41:15,19 43:9 44:5 45:2 46:18 53:22 54:3 56:7 61:10, 23 63:14,16 69:3,8,14,15,23 70:5, 8,20,23 71:6,13 72:17 74:7 93:5, 21 102:12
reasonableness 91:7	relationship 41:21 43:3 53:9	
reasons 30:4 41:7 67:10 93:23	reliable 34:6	
reassigned 100:13	relieved 66:9 101:18,23 102:7 105:6	
reassignment 101:24	relocation 19:13 21:14	
recall 6:25 10:2 11:5 17:10,14,17 22:6,9,10 49:11,12 51:20 64:24 85:8 92:20 95:10,13,15	rely 48:5	
receive 42:22	remedial 25:12	
received 99:5	remedies 26:3	
receiving 95:10	remedy 26:1	
recently 5:25	remember 15:18 64:20 81:7,9 85:12 86:25 91:24 92:19 96:16 97:7	
recess 40:19 85:6	removed 106:1	
	renewed 99:11	

respond 69:5
responded 32:9
response 48:19 57:24 58:3,21
59:9 67:3,24 68:3,17,19 71:15
72:1 86:20 87:6
responsibility 21:6
responsible 21:15 88:6
rest 36:25
result 16:25 17:2 25:13 34:5 42:1
resulted 85:21
results 42:15
retention 18:23 21:14 22:1
retest 78:15,24
retested 78:5
retired 11:5
review 9:11 72:11 73:19 80:18,21
90:21 91:1,5 95:6 99:3,7
rigged 105:24,25 106:7
ring 26:13,20
risk 54:9,12
Rodney 104:16
role 12:16 30:12,15 44:18 80:12
room 75:18
roster 63:24 64:6
rosters 49:5 61:10,23,24 62:1
64:4,16
rough 80:14
rounds 42:7 44:8 55:25 60:25
rundown 9:18,20
running 84:16
Rusty 7:1 20:24 35:10

S

safety 43:4,13 44:3 61:2 82:13
88:24
SAITH 107:8
salary 19:20 20:2,17
sally 74:23

schedular 49:4
schedule 45:19,21,22 46:4,18
49:2
scheduled 27:4,13 28:20
school 67:8
SCO 99:12
scope 83:7
scream 57:9
screen 33:12 78:5,25 86:14,15
94:23
screening 37:2 38:23
screenings 36:24 37:5,24 38:11
39:17
screens 74:3
scroll 33:19,23 63:21 68:23 98:8,
14,17
scrolled 86:22
search 56:5,16
searched 75:23
searches 41:23 56:11 76:13
79:16
seating 43:21
section 35:14
secure 27:7 57:8
secured 55:14 56:15 57:2
securing 55:1,5,19
security 54:12 64:18 91:25
102:25 104:3
Segregate 54:6
segregated 54:7
segregation 53:24 54:1,2,4,14,
15 56:25 57:6,15,16 102:17 104:1
105:17,20
send 13:2 63:17 88:3
sending 88:6
senior 99:9
sense 15:20 16:1 29:6 32:17,18
39:9 48:7 50:23
sentence 36:21,25 68:8,9 73:18
95:5 98:23

separate 54:5 72:24
September 88:3 99:11
sergeant 103:23
series 21:23 68:10
serve 36:11
services 36:5 72:24 73:2
set 19:15 63:1
sets 48:16 49:10
setting 60:8
shakedown 30:4
Shannon 11:3
shape 70:15
sharp 106:13
sharpened 102:20 106:13
shift 49:21 50:5,8,10,15,17,19,21,
22 51:1 63:24 64:16,18
shifts 49:7 50:3,12,13 63:24
shoot 28:24,25
short 41:3 75:21 76:1,2
short-staffed 56:4
shortly 10:25 39:18
shot 104:5,7
shotgun 103:16
shots 104:5
show 33:8 73:8 94:18 103:20
showed 103:1
shower 57:19
shut 21:2
sick 66:23
side 90:7
sign 90:23,24,25 91:1,3,5,11
signed 91:25
signing 91:8
simple 53:14 55:9
simply 83:17
single 105:7
sit 32:10 72:11

site 31:21 32:13 89:5	44:22 54:25 55:25 56:20 58:7,10, 13 65:16 66:22 74:9 75:18,19 78:20,21,23 99:3,10 102:15,18 103:5	stuff 26:7 30:4 32:1 39:24 41:6 48:5 57:10,23 75:23 76:4 98:7
sitting 22:9,10 26:2 29:11		submit 12:19 13:1 15:7 32:4 88:22
situation 12:21 103:13,15 104:2, 10,24 105:2	staffed 23:18,20 40:22 41:12,14 42:1,5,6 63:25 64:12 75:11 76:5	submitted 14:5 32:6,20 65:4 68:12 97:1
situationally 13:1	staffing 7:25 8:9 9:25 10:1,7,8 17:23 18:6,12,19,21 19:18 21:8, 10 22:3,12,21 23:3,7,15 24:1,3 35:13,14,17,22 44:13 55:5 60:4,8 62:14,21 63:13,17 67:1,13 74:19 78:16 80:3,12	submitting 30:21
situations 26:1 38:4 50:2 51:3 58:3 61:17 89:11	stamp 94:24	substance 73:19
size 103:17	stamped 71:22	substantial 48:14
skin 17:5	stand 28:3	suffering 94:6
slash 88:2,14	standard 25:18,19,21 26:4,7 79:21 95:6,14	suggest 20:2,6
sledge 103:11	stands 83:18 84:13	suggestions 25:25
slow 21:2	started 6:15 8:21 18:4 19:11 66:7,8	supervision 60:16,17,20 61:3
society 82:17	starting 18:25	supervisor 49:25 84:15
sold 77:16	state 5:12,18 17:18 34:3 35:24 36:3,10 40:8	support 36:5 65:5,16,19 66:1,15 72:23 73:2
solving 92:2	state's 90:7	supposed 57:20 58:19 60:25 78:5
somebody's 89:6,7	stated 22:2 35:7,21 101:17 105:13	Surprise 30:4
sooner 58:7,14,22	statement 102:21	Swindall 10:24
SOP 25:18	states 34:3 36:9,20 63:22 73:19 79:19 80:16,20 85:25 95:5	sworn 5:15
sort 48:20	stating 68:5	system 17:6 76:23 77:18
sounds 12:25 29:15 34:19 59:8	staying 50:4,25 51:2 67:7	
source 77:4,11	stayed 51:4	T
speak 52:14 99:21,24	stepped 31:19	
speaking 39:1	stop 73:4 89:22 92:11 101:13	taking 22:6
specialists 72:11,20	stops 92:11	talk 10:20 13:20 14:2 15:3 22:17 35:10 100:2
specific 9:17 17:21 25:25 56:21 60:5	storing 106:16	talked 22:11 23:25 24:19,22 35:6,12,21 43:25 67:2 93:6,10,13 100:11 105:1
specifically 89:19	Stranch 5:8	talking 7:13 10:2 22:24 34:11 35:23 60:8,21 64:7 68:9 76:7,8 103:6
spelled 5:20	strategy 18:6	talks 22:21 63:19 84:3
spelling 31:25	stress 42:15 93:12,15 94:7	TDOC 27:16,20 30:24 31:1,15 32:5 36:9 39:22 62:7,23 71:22 72:10,20 81:3 88:13 94:24 104:21,23
spend 72:18 99:18	strike 42:5 80:18	TDOC's 89:2
spent 21:7	struggle 74:5,8,12,15	team 72:9
spoke 100:10		technical 53:6
spoken 11:11 62:25		
spot 66:12		
spray 90:2,3 103:5		
spraying 91:23		
stabbing 16:25 17:2		
staff 19:5 34:4 40:11 41:5,7,21		

technically 50:15	83:19 84:3,19,21 85:2 86:19	55:25 56:25 57:3,4 58:2,14 60:7,
telling 32:14 67:18 70:22 75:9	90:18 92:24 95:20 99:12,18	20 61:2,5 63:3 67:25 69:25 70:1
86:15 98:11	100:15,21,23,24 101:6 102:23	72:16 74:6,18,19 75:4,14,15
tells 77:2	103:8 104:11 106:3 107:2	77:12 78:16 79:19 80:3 81:12
ten 29:9	timely 35:9 88:15	84:24 85:18 86:12 88:2 89:12
Tennessee 5:12 7:24 8:5,7,22,	times 11:25 12:11,13 14:25 15:21	91:15 92:4 100:12,16 101:5,19,24
24 9:5,12 11:18,22 13:10,14,15,	19:4 28:17 29:9,12 54:17,19,25	truthful 61:11
16,17 28:3 33:16	58:6 61:6,25 77:23 93:3,6 102:21	Turner 6:2 36:22 37:1 79:19
tenure 18:18 101:4	103:2,24	85:18
term 27:12 52:21 55:22	titled 35:14 63:11 68:3	turnover 35:15 43:1 49:19
terms 44:22	to-do 73:6	turns 103:19
terribly 84:17	today 5:3 22:9,10 26:2 29:12	two-week 45:12,15,20 46:2,11,
Terry 26:19	32:19 61:13 99:25	24 47:4 51:16,21
test 73:24 77:22 78:1,4 79:2	today's 99:19,22	type 47:20 48:18
tested 78:25	told 6:25 7:3,14 8:3 20:23 21:3	typically 15:3 50:21
testing 73:19 76:21 77:2,10,19	22:18 24:14 58:10,12 70:10	
text 10:20 71:22	102:18 103:10,19,23 105:9	<hr/>
thing 15:22 29:1 34:10 38:5	TOMIS 86:13	U
61:19,21,22 67:3,16 70:23 82:16	tonight 102:22 103:2	<hr/>
things 13:18 15:14 18:9,17,20	Tony 104:20,22	Uh-huh 30:16 68:21 83:23
19:5 21:13 35:22 39:20 40:8 41:4	top 69:6 84:13 94:24	unacceptable 70:15
43:7,12,25 44:7 48:18 57:12	total 29:24	understaffed 42:11,14,18 43:16,
63:15 66:13,25 92:21	totally 39:25 40:4 75:7	24 55:6 56:10,14 61:5 94:15
thinking 58:13,21 100:18	touch 57:7	understaffing 42:21,25 43:4
thought 20:25 58:10 79:6 104:9,	touched 83:13	75:15 84:24 93:8
11	toured 7:18	understand 15:17,19 24:12
thoughts 103:3	town 19:5 24:9	25:22 29:5,15 37:21 39:8 43:10
threat 103:10	traffic 74:22	61:16 63:8 75:7 82:11,12 93:9,19,
threw 104:4	training 42:22 94:13,16 99:5,8	20,21
throw 29:17 61:14	transferred 6:12,21 7:1,17	understanding 6:16 33:3 53:14,
throw- 74:8	transportation 50:14	15 105:5,8
Throwing 76:1	treasury 8:22 9:5,12 33:17	understood 8:8 58:23 63:4
thrown 75:16	treatment 73:20	unfilled 69:17
tie 55:14 76:1	trouble 30:21,23 31:12 54:2	unit 79:23
time 5:4,24 10:11 14:23 15:18	Trousdale 6:2,4,9,13,15,21 7:5,	unnecessary 91:17,19 93:7,24
16:10,12 18:20 21:9 23:5 26:5	13,15 8:9,21,24 9:4,25 10:11,18,	94:12
27:6,17,18 28:13 29:1,2,12,20	22 12:6 16:7 17:24 18:4,7,18	unnumbered 33:20
30:10 35:20 38:3,6 39:7,24,25	20:15 21:8 22:24 23:21,24 24:4	unrelated 28:19
40:4,6,10 43:21 45:23 48:19 50:3	25:10,13 26:9,22 27:10 30:13,20	unstaffed 70:2
51:23 52:8 56:9 57:24 58:3 59:9	31:9,13 32:22,24 33:5 34:21 35:5	untruthful 61:12
64:17,22 65:1 69:17 70:2 71:1,2	36:22 37:1,6,9,23 38:8 39:6,15,19	upset 84:17
72:16,18 75:21 78:17 80:5,17,21	40:4,6,10 44:24 47:9,25 48:1,23	use-of- 91:3
	49:6 51:24 52:1,6 53:25 54:13	use-of-force 92:21 99:4

V

Vacancies 14:1,10

vacant 64:17,23 65:1 71:1

valid 34:5

Vantell 104:17

variety 30:3 41:7

vendors 75:20,21

verify 63:25

versus 27:13 82:5

vet 66:11

vet all 65:6

vetted 65:8,13 66:15

video 96:17

Vinnie 104:17

violation 47:8

violence 8:13 44:3,18

violent 8:15 30:8 42:19 48:20 57:25 59:9 83:16

virtually 5:6

visible 61:1

visit 22:17 24:4

visited 24:7

Vo-tech 13:23

VP 11:2

W

W-A-L-L-S 19:15

waiting 101:1,24

walk 22:17 57:9

walked 11:1 102:24 103:3

Walls 19:14,16

Walton 62:7 64:12 73:13 79:14, 15 95:2

wanted 13:20 14:2,6 21:10 31:18 32:7

wanting 67:16

warden 6:25 12:6 20:18 22:21,23 26:9 30:15,20 32:22,24 33:6 35:4 38:8 48:9 69:25 88:2 91:14 92:4 100:16 101:4,19,23 104:3 105:11 107:4

wardens 13:16

Warren 104:18,19

Washburn 7:1 20:18

Wattwood 104:17

ways 19:7 44:22 74:21 75:4,24 76:7,11,14,15

weapon 84:4,5 102:20 103:7,20 104:4,6,7 106:9,13

weapons 42:2 81:24

weeds 17:21

week 12:8,9 15:4,21 24:5,17 29:1 45:7,8,10,18 100:9,10

weekend 107:6

weekly 13:3,4,7,8,19 15:4 24:16

weeks 45:7,10 51:13

Welborn 5:9 13:5 23:10,12 28:10 34:22 35:19 37:16,25 38:16 43:19 44:6 46:12 54:24 55:21 59:13,19, 22 69:7 70:3,17 71:3,11 78:10 80:4 81:13 85:4 94:8 99:25 106:24 107:4

white 71:24

wholeheartedly 29:20

wife 67:9

Wilson 33:18

window 103:13

word 18:14 56:22 74:14

words 95:24

work 18:5 31:21 44:24 45:1,4,8, 11,14,17 46:6,10,19,20 47:5,7 48:14 49:15 50:5,10,11,13 51:16 66:5 67:9 72:25 73:2,5 93:10

worked 12:15 22:21,23 23:16,18 24:3 41:11 45:20 50:7 57:3 58:17 74:11 82:9

working 6:15 18:4 45:22 51:12 55:16 66:7 96:23

world 23:1 82:14

worries 59:5

wow 25:9 70:14

write 92:2

written 64:12 88:2

wrong 18:24 28:24 29:18 48:4 52:17 65:7

wrote 78:12 87:25

Y

year 15:19 102:9

years 82:8

Z

Zoom 5:6 99:22